

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:)
) Chapter 11
)
ZACHRY HOLDINGS, INC., <i>et al.</i> ¹) Case No. 24-90377 (MI)
)
Debtors.) (Jointly Administered)
) Re: Docket No. 2769

**AMENDED CERTIFICATE OF COUNSEL REGARDING
SUSMAN GODFREY L.L.P.’S FINAL FEE APPLICATION FOR ALLOWANCE OF
COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR
THE PERIOD FROM MAY 21, 2024 THROUGH FEBRUARY 27, 2025**

Pursuant to the *Procedures for Complex Cases in the Southern District of Texas*, counsel to the above-captioned debtors and debtors in possession (collectively, “**Debtors**”) certifies as follows:

1. On April 18, 2025, Debtors filed *Susman Godfrey L.L.P.’s Final Fee Application for Allowance of Compensation and Reimbursement of Expenses for the Period from May 21, 2024 Through February 27, 2025* [Docket No. 2769] (the “**Fee Application**”). The Fee Application attached a proposed order [Docket No. 2769-1] (the “**Proposed Order**”).
2. The deadline for parties to file objections and responses to the Fee Application was May 9, 2025 at 12:00 p.m. (prevailing Central Time) (the “**Objection Deadline**”). No objections or responses to the Fee Application were filed on the docket on or before the Objection Deadline. Counsel has not received comments from any party.
3. Debtors respectfully request that the Court enter the Proposed Order that is attached to this Certificate of No Objection.

¹ The last four digits of Zachry Holdings, Inc.’s tax identification number are 6814. A complete list of each of the Debtors in these chapter 11 cases and the last four digits of their federal tax identification numbers may be obtained on the website of the Debtors’ proposed claims and noticing agent at www.veritaglobal.net/ZHI. The location of the Debtors’ service address in these chapter 11 cases is: P.O. Box 240130, San Antonio, Texas 78224.

Date: May 12, 2025

Respectfully submitted,

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Special Litigation Counsel for Debtors

Certificate Of Service

I certify that on May 12, 2025, I caused a copy of the above Certificate of Counsel to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Jesse-Justin Cuevas

Jesse-Justin Cuevas